

Via ECF

July 22, 2022

The Honorable P. Kevin Castel, U.S.D.J.
United States District Court, S.D.N.Y.
500 Pearl Street
New York, NY 10007

Re: Esther Wilder v. Sarah Hoiland, Case No. 1:22-cv-01254-PKC, Defendant's Response to Plaintiff's Request for Extension of Discovery Schedule

Dear Judge Castel,

While I do not consent to the Plaintiff's request for a 60-day extension, I will not oppose it.

This is the third time I have initiated or willingly entered into mediation since 2019. Delays followed by escalation characterize the Plaintiff's tactics, within the City University of New York (CUNY) and now in the Southern District. I am a single mom with an adolescent who requires a specialized school setting with a significant personal contribution and I am leading a newly funded \$2.3M summer program for student parents and their children in the South Bronx. With scant time, I produced the requested documents (165 pages) and participated in mediation with legal representation with the hope of putting a long-overdue end to this dispute. On the other hand, the Plaintiff and her counsel have engaged in numerous delay tactics. When I requested to delay discovery until after mediation was rescheduled (June 23), Plaintiff's counsel agreed to three (3) additional days and then sent objections to every one of my discovery requests and have still not produced any documents.

For these reasons, I do not consent to the request but will not oppose it. Thank you for your time and consideration.

Respectfully submitted,

Sarah L. Hoiland, *Pro Se Defendant*



79 Hamilton Place #10
New York, NY 10031

cc: Janet Linn, Plaintiff's Counsel, via e-mail